

GIA Environmental Health and Safety Hazardous and Nonhazardous Waste Management Standard

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ABSTRACT: This GIA standard defines the basic elements and responsibilities of a site Hazardous and Nonhazardous Waste Management Program.

APPLICABILITY: This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent local regulations.

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1 INTRODUCTION

The purpose of this GIA standard is to define the basic elements and responsibilities of a site Hazardous and Nonhazardous Waste Management Program.

1.1 SCOPE

This standard shall apply to GIA facilities and operations worldwide unless superseded by more stringent county and/or local regulations.

1.1.1 Policy

Each site shall develop, document, and implement a Hazardous and Nonhazardous Waste Management Program.

1.2 RESPONSIBILITIES

This subhead describes the responsibilities of the persons involved in fulfilling the requirements of this document.

- Site Manager

Ensure the site or plant is in compliance with all applicable hazardous and nonhazardous waste management regulations.

Ensure that site Environmental Health and Safety (EH&S) personnel are knowledgeable and sufficiently trained to implement this standard.

Sign all reports required by regulatory agencies.

Review and sign all permit applications.

Consult on notification to regulatory agencies in the event of a violation.

Hold employees accountable for their portions of this standard.

- Department Managers, Supervisors, Engineering and Facilities Staff

Ensure existing equipment, including waste management control equipment, is properly maintained.

Inform site EH&S well in advance of any planned change or addition to process equipment that could result in a change, positive or negative, to any hazardous or nonhazardous hazardous waste stream.

Inform site EH&S of any equipment malfunction or process excursion that could result in the increase of a hazardous or nonhazardous waste stream.

Provide leadership in the development and implementation of new and innovative hazardous and/or nonhazardous waste stream abatement strategies to meet the goals of waste stream reduction.

- Operators and Employees

Verify that existing equipment, including control equipment, is maintained.

Inform the supervisor of any equipment malfunction or process upset.

Assist in the development and implementation of new technologies to meet the goals of waste stream reduction.

Understand the hazards associated with the management, storage, and handling of hazardous and nonhazardous waste.

Attend training, as required.

- Site Environmental Health and Safety (EH&S)

Develop and implement the Hazardous and Nonhazardous Waste Management Program.

Interact, as necessary, with regulatory agencies.

Provide training for employees in the management, storage, and handling of hazardous waste.

Acquire and maintain on-site up-to-date country and local hazardous and nonhazardous waste management regulations.

Be knowledgeable of the current and emerging requirements of applicable hazardous and nonhazardous waste management regulations.

Evaluate hazardous and nonhazardous waste streams to determine the level of approvals and notifications that may be required.

Annually review the status of hazardous and nonhazardous waste management approvals and notifications, and ensure they are maintained.

Assist manufacturing, engineering, and facilities personnel in the approval, notification, and control requirements for new processes and facilities. Review all new processes at the design and capital approval request stage. Work with appropriate personnel, such as external consultants and engineers and so forth, to be sure the design of new processes include applicable hazardous and nonhazardous waste management requirements.

Verify any suspected violations in hazardous and nonhazardous waste management regulations, and notify and consult with all appropriate individuals, including the Plant Manager, the Law Department, and Area EH&S.

Notify the regulatory agency of any verified violation, if appropriate. If possible, consult with management, Area EH&S, and the Law Department prior to notification.

Assist in the development and implementation of appropriate abatement strategies to meet the goals of hazardous and nonhazardous waste stream reduction.

Conduct any required hazardous and/or nonhazardous waste chemical profile analyses to prepare notifications and comply with reporting requirements.

Maintain and track both projects that minimize hazardous and nonhazardous waste generation and the annual cost of the Hazardous and Nonhazardous Waste Management Program.

- Area EH&S

Provide consultation and training, as required.

Assist in the development and implementation of abatement strategies.

Assist in notification procedures in the event of a violation.

Review hazardous and nonhazardous waste regulatory reports, chemical profile analyses, and program costs.

Review capital approval requests for new hazardous and nonhazardous waste control equipment and modifications to existing equipment.

1.3 LANGUAGE REQUIREMENT FOR THE STANDARD

The details of this standard and all documentation associated with it, such as manuals, training materials, signs, labels, postings, and so forth, must be available in English and the accepted and official local languages.

2 PROGRAM ELEMENTS

This segment describes the elements of the Hazardous and Nonhazardous Materials Management Program that include regulatory compliance, inventory, tracking, monitoring, and reporting.

2.1 REGULATORY COMPLIANCE

A plan shall be in place and documented to maintain compliance with applicable local and country regulations at a minimum.

2.2 INVENTORY AND TRACKING

A plan shall be in place to inventory and track all regulated hazardous and nonhazardous waste streams as applicable to the site waste stream reduction strategy and local and/or country regulations.

2.3 MONITORING AND REPORTING

Each facility shall monitor its hazardous and nonhazardous waste streams as required by regulatory authority.

Certified analytical results shall be used for all regulatory reporting requirements.

A file of all compliance reports shall be maintained at the site and copies sent to Area EH&S and the Law Department.

2.4 EMISSIONS REDUCTION AND WASTE MINIMIZATION

A waste minimization plan shall be developed, implemented, maintained, and documented, holding the process units responsible for new and existing processes, to reduce hazardous and nonhazardous waste streams.

The plan shall require the use of nonregulated materials or materials with reduced toxicity.

The plan shall require implementation of in-line treatment, recycling, reclamation, and techniques to conserve resources.

The plan shall prohibit transferring pollutants from one medium to another, where possible, unless that transfer reduces the overall toxicity of the discharge.

Efforts to reduce the amount or toxicity of pollutants in the discharge shall be documented.

A mass balance report shall be generated annually.

The annual cost of the Hazardous and Nonhazardous Waste Management Program shall be documented.

2.5 EQUIPMENT MAINTENANCE

A plan shall be in place to correctly operate and maintain all equipment that emits or controls the hazardous and/or nonhazardous waste streams. Record keeping and supervisory approval requirements shall be included in the plan.

Process and control equipment shall be inspected, at least quarterly, to ensure its proper operation and maintenance. Records of these activities shall be maintained.

Equipment specifications and up-to-date drawings, including hazardous and/or nonhazardous waste stream emission points, are to be kept on file.

Process flow and piping diagrams shall be kept current.

2.6 EVALUATION OF APPROVAL AND NOTIFICATION REQUIREMENTS

The hazardous and nonhazardous waste approval and notification requirements of the facility shall be evaluated based on the:

- Number and types of sources

- Available waste stream volume information

- Control equipment specifications

Applicable regulations

Construction or modification of operations impacting the hazardous and/or nonhazardous waste stream shall not begin until all necessary permit approvals have been secured and notifications made, or it is determined that approvals or notifications are not required.

At a minimum, the hazardous and/or nonhazardous waste stream(s) from the facility must meet the requirements contained in the approval and notification for the facility and any applicable regulations.

2.7 APPROVAL AND NOTIFICATION MAINTENANCE

An evaluation of the program status of the facility shall be performed annually and be based on changes in the:

Regulations

Process

Production rates

The program shall be maintained to ensure that approvals and notifications are current, that all fees have been paid, and that files are maintained.

An inventory of all hazardous and nonhazardous waste shall be maintained at the site or plant and updated annually.

2.8 PROCESS INSTALLATION OR MODIFICATION

An assessment of the regulatory impact must be made during the planning and design of any new facility or any modification of a facility or process that could trigger additional regulatory requirements.

The assessment must identify or confirm hazardous and nonhazardous waste streams and evaluate them according to the regulations and any existing regulatory requirements.

A compliance strategy shall be developed if the assessment indicates that the installation or modification would trigger new regulatory requirements.

A toxic use reduction strategy shall be part of all planning and design for process installations and modifications.

2.9 RESPONSE TO VIOLATIONS

Any suspected violations of a hazardous and/or nonhazardous waste condition or a solid and/or hazardous waste management regulation must be immediately verified for accuracy by site EH&S.

Any substantiated violation must be reported to the Plant Manager, Area EH&S, and the Law Department as soon as verification is made.

In any noncompliance situation, the cause of the violation is to be identified and corrective action undertaken as soon as possible.

Verbal and written notification(s) to regulatory agencies shall be made, when appropriate, and within the required time frame after consultation with the Plant Manager, Area EH&S, and the Law Department. Document all verbal correspondence.

A documented investigative report shall be prepared and sent to Area EH&S, the Law Department, and the appropriate regulatory agencies, as required. All reports are to be retained on site.

2.10 HANDLING AND SAFETY

Waste Stream Management

A plan shall be in place to inventory, track, and control all hazardous and nonhazardous waste streams from purchase through final disposal.

A plan shall be in place to inventory, track and control all medical wastes from the generation point through final disposal.

Certified analyses shall be conducted on waste streams for hazardous material content as required by country and/or local regulation.

Hazardous and nonhazardous waste shall be segregated into separate waste streams, where possible.

Mixing of wastes is to be avoided whenever possible, especially when hazardous and nonhazardous wastes are involved.

Disposition of Hazardous Materials or Components in Digital Products

All hazardous components and materials contained in Digital products must be properly disposed of and be recycled or reclaimed whenever possible.

Disposal shall be in accordance with Corporate Waste Management Policies and Standards, as well as applicable country and/or local regulatory requirements.

Hazardous materials contained in Digital products shall *NOT* be disposed of in an unsecured landfill or in uncontrolled discharges to air, water, or land.

Examples of waste streams include, but are not limited to the following:

- Nonhazardous wastes: paper, plastic, ferrous metals, glass, landscape, components, precious metals, magnetic media, wood, nonferrous metals, packaging (refer to *DEC STD 043-0 Packaging Requirements for Digital Products, Parts, Assemblies, and Materials.*)
- Mixed wastes: construction and cafeteria debris
- Hazardous wastes (must be analyzed to determine degree of hazard): used oils, mercury switches, certain components, and PCB (polychlorinated biphenyls) or other as defined.

- Refer to *EL-CP758-00, Corporate Waste Management Policy—Principles of Waste Management*, *EL-CP758-01, Corporate Waste Management Policies—Process*, and *EL-CP758-02, Corporate Waste Management Policy—Disposition and Reclamation of Inventory and Fixed Assets*.

2.11 TRANSPORTATION AND STORAGE

Digital will only use hazardous and nonhazardous waste transportation companies approved by Area and site EH&S, Purchasing, and Security.

A plan shall be in place to ensure Digital and external transporters of hazardous and nonhazardous waste comply with applicable regulations.

All wastes shall be stored in accordance with applicable country and/or local requirements and so that potential leaks and spills are prevented.

Containers shall be compatible with the waste contained in them and shall be in good condition.

Containers shall be marked and labeled.

Incompatible wastes shall be segregated.

Waste containers shall be kept closed during storage.

An inventory shall be maintained for all stored wastes, which includes the following information:

- Accumulation start-date

- Type of waste

- Location

- Volume of waste (to be known at all times)

- Personal protective equipment requirements

- Method of removal

Waste storage areas shall be constructed according to applicable regulations and should as a minimum include the following:

- Segregation from the plant and potential contact with the public

- Segregation to prevent reactive mixing

- Signs warning of contents, hazards, and access restrictions

- Means to prevent access to unauthorized personnel

- Ready access to spill control, fire protection, and personal protective equipment

Assurance that drums used for fresh or spent hazardous and nonhazardous wastes are handled in a manner so as not to pose a threat to persons or to the environment

Maintain manifests, shipping documentation, and so forth in separate files and retain records for a minimum of three years.

2.12 WASTE MANAGEMENT COMPANY REQUIREMENTS

Operators and owners of hazardous and nonhazardous waste recycling, reclamation, incineration, treatment, storage, and disposal facilities shall comply with applicable regulations, as appropriate.

Area and site EH&S, Purchasing, and Security shall develop criteria by which waste management companies are qualified and audited to ensure EH&S risks are controlled and minimized.

Contractors operating at Digital sites shall properly dispose of hazardous and nonhazardous waste generated from their activities unless otherwise directed by Digital. Refer to Waste Management supplier qualification requirements.

Contracts with suppliers of materials and equipment to Digital shall include requirements for the following:

- Selection of recoverable, nonhazardous, or less toxic materials

- Proper disposition of hazardous and nonhazardous wastes generated from the supplier's activities, including packaging materials supplied with goods purchased from the supplier

2.13 PROGRAM AUDIT

A plan shall be in place to audit all hazardous and nonhazardous waste activities, including waste management company sites and transporters, to ensure compliance with regulations.

Hazardous and nonhazardous waste storage sites at each plant shall be inspected weekly, at a minimum. Records of the inspections shall be maintained.

An internal audit of all hazardous and nonhazardous waste activities shall be conducted monthly. Records of the inspections shall be maintained.

2.14 TRAINING

Annually train employees who handle hazardous and/or nonhazardous waste in such areas as:

- Safety hazards

- Chemical compatibility

- Emergency spill and response

- Material handling and transportation

Medical surveillance requirements

Bulk chemical delivery, as required

APPENDIX A REFERENCED DOCUMENTS

A.1 EL-Class Digital Documents

EL-Class Number	Document Title
EL-00043-00	<i>DEC STD 043-0 Packaging Requirements for Digital Products, Parts, Assemblies, and Materials</i>
EL-CP758-00	<i>Corporate Waste Management Policy—Principles of Waste Management</i>
EL-CP758-01	<i>Corporate Waste Management Policies—Process</i>
EL-CP758-02	<i>Corporate Waste Management Policy—Disposition and Reclamation of Inventory and Fixed Assets</i>

Use VTX SMC to order copies of EL-class documents from Standards and Methods Control. Send distribution questions to JOKUR::SMC or call DTN: 234-4423.

EL-CP758-00, EL-CP758-01, and EL-CP758-02 are also available through VTX WASTE.

A.2 Other Digital Documents

Document Number	Document Title
	<i>Disposition of Property, Plant, and Equipment, Corporate Accounting and Reporting Manual, Policy # 304-04</i>

This document is available through VTX WASTE, or contact Corporate Waste Management at MSO2-1/11.

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